

**Comment 1 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 1st Workshop.**

First Name: Catherine
Last Name: Price
Email Address: catherine.price@shell.com
Affiliation: Shell

Subject: Albion Heavy Synthetic GHG intensity in LCFS 2013 crude baseline
Comment:

We have reviewed the recently published draft calculation of the California Industry Average Crude Carbon Intensity for 2013. We have noted that GHG intensity of AHS is reported in this document as 21.02 gCO₂e/MJ, a value calculated with OPGEE 1.0.

We believe that this value of 21.02 gCO₂e/MJ contains an error due to higher and lower heating values being confused when coefficients from Canada's GHGenius model (which works in HHV) were used unchanged in California's OPGEE 1.0 model (which works in LHV). My colleague Trevor Stephenson engaged in some communication on this matter with Adam Brandt which resulted in the OPGEE 1.0 model being corrected. The resulting updated value of 19.86 gCO₂e/MJ was published in the minutes of CARB's "LCFS Proposed 2013 Regulatory Amendments" workshop of March 5th, 2013 (see http://www.arb.ca.gov/fuels/lcfs/regamend13/Draft_Crude_CI_Values_%28OPGEEv1.1_DraftA%29_March_4_2013.pdf).

Please could you confirm that this value will be corrected in the 2013 calculation and in upcoming regulatory updates to adopt the latest "OPGEE" model (v. 1.1) going forward?

Thank you very much.

Kind regards,
Catherine

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-06-24 03:44:44

No Duplicates.

Comment 2 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws) - 2nd Workshop.

First Name: Elena

Last Name: Guilfoil

Email Address: elena.guilfoil@ecy.wa.gov

Affiliation: Washington State Dept. of Ecology

Subject: Possible Table Mistakes

Comment:

I offer suggestions for correcting possible mistakes in the table. My comments refer to references to 2012 instead of 2014. If you intended the 2012 references, then I misunderstood your intent.

1. Please take a look at the title of the table as it appears to be a combination of the 2012 and 2013 table titles.

2012--Table 1: 2012 Crude Average Carbon Intensity Calculation

2013--2013 Crude Average Carbon Intensity Calculation

2014--Table 1: 2012 Refinery Crude Supply

The language in the 2014 document is similar to the other 2 LCFS Crude Oil Lifecycle Assessments so you might consider changing the title to "2014 Crude Average Carbon Intensity Calculation."

2. Under the "Crude Name" column, the first item is "2012 Volume Weighted Average CI." This analysis calculates the average CI for 2014. Should the cell say "2014 Volume Weighted Average CI"?

3. 11.35 is listed in the first cell under the "CI" column. Your document says the 2014 crude average carbon intensity is 11.30.

4. The last column heading is "2012 Volume." Should this be 2012, 2013 and 2014 Volume? This would be consistent with formatting in the other 2 assessments.

5. The first cell in the last column lists 594,494,779. I am confused why there is a number in this cell when the other 2 assessments left this cell blank. You may simply have changed your format but I didn't see an explanation for this change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-05-19 12:28:43

No Duplicates.

**Comment 3 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 2nd Workshop.**

First Name: Jason

Last Name: Goklaney

Email Address: jgoklaney@envirotechteam.com

Affiliation:

Subject: 2014 CI Value Comment

Comment:

Please see attachment "LCFS Comment" which addresses variation among the CI value assigned to a specific field within California and the CI values of producers located within the field when calculated individually.

Attachment: www.arb.ca.gov/lists/com-attach/9-lcfs-crude-oil-ws-Uz8CZ1A3VXUCW1Q3.pdf

Original File Name: LCFS Comment.pdf

Date and Time Comment Was Submitted: 2015-06-02 15:23:05

No Duplicates.

**Comment 4 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 3rd Workshop.**

First Name: Chris

Last Name: Torres

Email Address: dadofranki@yahoo.com

Affiliation: Farmer

Subject: Reasons for more regulation

Comment:

Why does CARB believe we need more regulation?

CARB does not have the funding to regulate more. All this does is put businesses at a disadvantage in the state. It makes for higher living costs for individuals. This just seems like a grab for more public jobs.

Public entities do not create jobs that are viable for the future. They have to be paid for, usually by higher taxes on all.

How dependable is the science behind this? It has been proven in the past that the science is not dependable and quite suspect.

Scrap this process.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-05-22 05:59:54

No Duplicates.

**Comment 5 for Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws)
- 3rd Workshop.**

First Name: Tim
Last Name: Lovley
Email Address: tlovley@macphersonenergy.com
Affiliation:

Subject: Comments to LCFS Crude Oil WS 2017
Comment:

Please see attached

Attachment: www.arb.ca.gov/lists/com-attach/11-lcfs-crude-oil-ws-AWxROFw+U14DNwY2.docx

Original File Name: MOC 2017 CI Value Comments 06.05.2018 (2).docx

Date and Time Comment Was Submitted: 2018-06-05 16:44:50

No Duplicates.

There are no comments posted to Comments on Crude Oil analysis for LCFS (lcfs-crude-oil-ws) that were presented during the Workshop at this time.